

### **REMARKS/ARGUMENTS**

This Amendment is in response to the Office Action mailed November 16, 2007.

Claims 1-3 and 6-14 are pending in this application. Claims 1-3 and 6-14 are rejected. Claims 1, 8, and 14 have been amended by this response. Reconsideration of the rejected claims is respectfully requested.

#### **Claims 1-3, 6 and 7**

##### **I. Rejection under 35 U.S.C. §102**

Claims 1-3 and 6-14 were rejected under 35 U.S.C. §102(e) as being anticipated by Mikhailov et al. (Pat No. 6,968,500). Applicants respectfully submit that Mikhailov does not disclose each element of the amended claims. For example, Applicants' claim 1 as amended recites a metadata validation system for validating an object model, the system comprising:

a configuration management module for creating a deployable collection of objects using the object model, wherein the deployable collection represents a tree of objects starting at a root object; (*emphasis added*).

Applicants submit that several of the features recited in claim 1 are not taught by Mikhailov.

For example, claim 1 specifically recites "a configuration management module for creating a deployable collection of objects using the object model, wherein the deployable collection represents a tree of objects starting at a root object." Applicants submit that this feature recited in claim 1 is not taught by Mikhailov.

Mikhailov describes that

"Generally described, the invention includes a method and system for handling forms. The forms handling system receives a form from a form publisher. This form includes one or more data submission fields configured to receive user input. The forms handling system processes the form to identify the data submission fields and correlating each data field to a database field type supported by a database application. The forms handling system then creates database tables or other database structures in the database application corresponding to the form. This database table or structure includes a storage element, such as a column in the table, corresponding to each data submission field. The forms handling system then publishes the form to receive form submissions including data entries into the data submission fields of the form. The forms handling system receives one or more form submissions from visitors accessing the forms system. The forms

handling system enters the data entries of the form submissions into the corresponding storage elements of the database structure." (Mikhailov, col. 3, lines 19-37)

It is asserted on the office action that the forms handling system of Mikhailov receives a form from a user , then creates a database table that corresponds to the form, and correlates each form submission field with a database storage element, such as a column in the database table. (Mikhailov, col. 5, lines 21-32). Furthermore, reports may be generated. It is interpreted that the creation of a database table for a user-submitted form and/or the creation of reports teaches, "creating a deployable collection of objects using the object model," as recited in claim 1. Applicants respectfully disagree.

Applicants submit that the database table that corresponds to the user's form is not a "deployable collection of objects." At creation, the database table is empty and has not been populated. Thus, the database table cannot teach the "deployable collection of objects." Furthermore, even when the form submissions are received and entered in the database table, each submission occupies one row in table, and each data entry of the submission is stored into a column in the table. (Mikhailov, col. 3, lines 19-37). There is no indication that the records of the database table have any type of hierarchical relationship that can be represented in a tree. Accordingly, there is nothing to indicate that the submission stored in the database table are "deployable collection of objects using the object model, wherein the deployable collection represents a tree of objects starting at a root object," as recited in claim 1. Furthermore, the reports generated by the forms handling system of Mikhailov are merely made up of data entries associated with the storage elements, i.e., columns of the database table. (Mikhailov, col. 3, lines 41-45). Accordingly, Mikhailov does not disclose, "deployable collection of objects using the object model, wherein the deployable collection represents a tree of objects starting at a root object," as recited in claim 1.

**Claims 1-3 and 6-14**

**II. Rejection under 35 U.S.C. §102**

Claims 1-3 and 6-14 were rejected under 35 U.S.C. §102(e) as being anticipated by Mikhailov et al. (Pat No. 6,968,500). Applicants respectfully submit that Mikhailov does not disclose each element of the amended claims. For example, Applicants' claim 1 as amended recites a metadata validation system for validating an object model, the system comprising:

a validation engine for validating the metadata in the database by confirming the metadata complies with one or more validation rules, wherein said validation engine is configured to perform completeness validation on a validation subject in response to a user entered command to perform validation on the validation subject, to automatically perform correctness validation on a validation subject when the subject is created or updated, and to automatically perform completeness and correctness validation on a validation subject when requested by the configuration management module. (*emphasis added*).

Applicants submit that several of the features recited in claim 1 are not taught by Mikhailov.

For example, claim 1 specifically recites, in part, "validating the metadata in the database by confirming the metadata complies with one or more validation rules." Applicants submit that this is not taught by Mikhailov.

It is asserted in the office action that the metadata, as recited by claim 1, is taught by the service definition specifying form logic of Mikhailov. (Office Action p. 6). It is also asserted that Mikhailov discloses validating the metadata by querying the metadata of the database" to determine if form publisher review is required and, "to determine if a revised submission has been received." Applicants respectfully disagree.

For purposes of argument, even if the service definition is regarded as the metadata, as suggested in the office action, Mikhailov fails to disclose validating the metadata by confirming the metadata complies with one or more validation rules. It should be emphasized that the purpose of "querying the metadata of the database," is to determine if the form submission is required to abide by any special submission handling instructions that were provided by the user. Moreover, the submission processing routine of Mikhailov then verifies that the form submission abides by those special submission handling instructions. (Mikhailov,

col. 15, lines 59-67). Thus, Mikhailov does not consider whether or not the service definition (i.e., metadata) itself is valid. It is assumed that the service definition is valid. Instead, Mikhailov uses the submission handling instructions to ensure that the form submission is valid. Determining whether the form submission is valid because the form submission abides by the special submission handling instructions does not teach " confirming the metadata complies with one or more validation rules," as recited in claim 1. The form submission of Mikhailov is not metadata., it is the data itself, which is stored in the database table corresponding to the user-supplied form. Accordingly, Mikhailov does not disclose validating the metadata by confirming the metadata complies with one or more validation rules, as is recited by claim 1.

As such, Mikhailov cannot anticipate Applicants' claim 1, or the claims that depend therefrom. Independent claims 8 and 14 recite limitations that similarly are not disclosed by Mikhailov, and further disclose meta metadata objects, as discussed above, which are not disclosed by Mikhailov, such that Mikhailov cannot anticipate claims 8 and 14, or the claims that depend therefrom. Applicants therefore respectfully request that the rejection with respect to the pending claims be withdrawn.

## II. Amendment to the Claims

Unless otherwise specified, amendments to the claims are made for purposes of clarity, and are not intended to alter the scope of the claims or limit any equivalents thereof. The amendments are supported by the specification and do not add new matter.

**CONCLUSION**

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance and an action to that end is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 650-326-2400.

Respectfully submitted,  
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